

APR 12 2016

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN

CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT BAÑOS,

Defendant.

CRIMINAL NO. 16-1423 mcaCounts 1 – 5: 26 U.S.C. § 7206(1): Making and  
Subscribing False Tax ReturnsINDICTMENT

The Grand Jury charges:

Count 1

On or about April 11, 2010, in Taos County, in the District of New Mexico, and elsewhere, the defendant, **ROBERT BAÑOS**, did willfully make and subscribe a U.S. Individual Income Tax Return for the calendar year 2009, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That income tax return, which was filed with the Internal Revenue Service, reported at Line 22 total income in the amount of negative \$78,710, whereas, as he then and there well knew, he received income in excess of the amount stated in the return.

In violation of 26 U.S.C. § 7206(1).

Count 2

On or about October 13, 2011, in Taos County, in the District of New Mexico, and elsewhere, the defendant, **ROBERT BAÑOS**, did willfully make and subscribe a U.S. Individual Income Tax Return for the calendar year 2010, which was verified by a written declaration that it was made under the

penalties of perjury and which he did not believe to be true and correct as to every material matter. That income tax return, which was filed with the Internal Revenue Service, reported at Line 22 total income in the amount of negative \$29,412, whereas, as he then and there well knew, he received income in excess of the amount stated in the return.

In violation of 26 U.S.C. § 7206(1).

Count 3

On or about April 15, 2012, in Taos County, in the District of New Mexico, and elsewhere, the defendant, **ROBERT BAÑOS**, did willfully make and subscribe a U.S. Individual Income Tax Return for the calendar year 2011, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That income tax return, which was filed with the Internal Revenue Service, reported at Line 22 total income in the amount of negative \$58,937, whereas, as he then and there well knew, he received income in excess of the amount stated in the return.

In violation of 26 U.S.C. § 7206(1).

Count 4

On or about April 15, 2013, in Taos County, in the District of New Mexico, and elsewhere, the defendant, **ROBERT BAÑOS**, did willfully make and subscribe a U.S. Individual Income Tax Return for the calendar year 2012, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That income tax return, which was filed with the Internal Revenue Service, reported at Line 22 total income in the amount of negative \$27,745, whereas, as he then and there well knew, he received income in excess of the amount stated in the return.

In violation of 26 U.S.C. § 7206(1).

Count 5


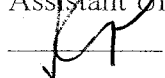
On or about September 3, 2014, in Taos County, in the District of New Mexico, and elsewhere, the defendant, **ROBERT BAÑOS**, did willfully make and subscribe a U.S. Individual Income Tax Return for the calendar year 2013, which was verified by a written declaration that it was made under the penalties of perjury and which he did not believe to be true and correct as to every material matter. That income tax return, which was filed with the Internal Revenue Service, reported at Line 22 total income in the amount of negative \$15,152, whereas, as he then and there well knew, he received income in excess of the amount stated in the return.

In violation of 26 U.S.C. § 7206(1).

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY

  
Assistant United States Attorney  
 04/04/16 3:55PM